

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BONNIE MARCUS, et al	:	
	:	
Plaintiffs	:	CIVIL ACTION NO.: 07-02075
	:	
v.	:	
	:	
PQ CORPORATION	:	
	:	
Defendant	:	

ORDER

AND NOW this _____ day of _____, 2009, upon consideration of Plaintiffs' Motion in Limine to Admit Certain Evidence at Trial, it is hereby ORDERED and DECREED, that said motion is GRANTED. Plaintiff shall be permitted to introduce the following testimony:

- 1) The testimony of Mr. Myszak that Roz Kutchins told him of a comment by Ms. Colleen DelMonte that, "We need to get rid of some of these old farts"
- 2) The testimony of Mr. Myszak that he was informed that PQ's CEO and Executive Vice-President were looking for "younger people" in the work force.
- 3) The testimony of Ms. Kutchins that the general counsel of PQ informed her that management was looking for younger individuals.
- 4) The testimony of Ms. Kutchins pertaining to Mr. Imbriani's statement to her that he wanted her to get younger blood.

Hon. John P. Fullam
United States District Judge

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BONNIE MARCUS, ROMAN WYPART, :	
ERNEST SENDEROV, and :	
MARY ELLEN CALLAGHAN, :	
	:
Plaintiffs	:
	:
v.	:
	:
PQ CORPORATION	:
	:
Defendant	:

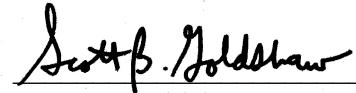
**PLAINTIFFS' MOTION IN LIMINE TO
ADMIT CERTAIN EVIDENCE AT TRIAL**

NOW COME the plaintiffs, Bonnie Marcus, Roman Wypart, Ernest Senderov and Mary Ellen Callaghan, by their counsel, Scott B. Goldshaw, Esq., and respectfully request this Honorable Court to allow for the admission of the following evidence at trial, as more fully described herein:

- 1) The testimony of Mr. Myszak that Roz Kutchins told him of a comment by Ms. Colleen DelMonte that, "We need to get rid of some of these old farts."
- 2) The testimony of Mr. Myszak that he was informed that PQ's CEO and Executive Vice-President were looking for "younger people" in the work force.
- 3) The testimony of Ms. Kutchins that the general counsel of PQ informed her that management was looking for younger individuals.

4) The testimony of Ms. Kutchins pertaining to Mr. Imbriani's statement to her that he wanted her to replace Mr. Myszak with "younger blood."

Respectfully submitted,



Scott B. Goldshaw - ID. 85492
Katie R. Eyer - ID. 200756
SALMANSON GOLDSHAW, P.C.
Two Penn Center
1500 J.F.K. Blvd., Suite 1230
Philadelphia, PA 19102
215-640-0593

Date: June 18, 2009

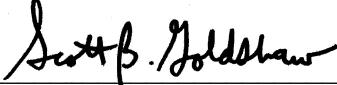
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Plaintiffs	:	CIVIL ACTION NO.: 07-02075
	:	
v.	:	
	:	
PQ CORPORATION	:	
	:	
Defendant	:	

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2009, I caused a true and correct copy of the foregoing *Plaintiffs' Motion in Limine to Admit Certain Evidence at Trial*, to be filed via the Official Court Electronic Document Filing System, and that said document is therefore available for viewing and downloading from the ECF system. By virtue of this filing, service of the motion upon the following counsel, being Electronic Case Filing Users, is complete upon counsel's receipt of the Court's e-mail notification of the Notice of Electronic Filing:

Elizabeth A. Malloy
Peter J. Ennis
Counsel for Defendant



Scott B. Goldshaw